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June 17, 2021

BY ELECTRONIC CASE FILING

The Honorable Pamela K. Chen  
United States District Judge  
United States District Court  
for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Carlos Martinez*, Case No. 15-cr-252  
(Def. No. 33) (PKC)

Dear Judge Chen:

I represent Defendant Carlos Martinez in the above-captioned case, pending before Your Honor. Through this letter, Mr. Martinez moves for an order modifying his daily curfew on Monday, June 21, 2021, to end at 5:30 a.m. and begin at 11:30 p.m.

Under his current conditions of release, Mr. Martinez's curfew runs from 11:00 p.m. to 6:30 a.m. *See Aug. 10, 2020 Order*. Mr. Martinez will be traveling to New York on Monday, June 21, 2021 to appear at a hearing in this matter. To arrive at the airport in time for his departing flight, he will need to leave his home at approximately 5:30 a.m. His return flight will likely not allow him to return to his home prior to the start of his 11:00 p.m. curfew. Given this, Mr. Martinez respectfully requests the Court enter an order modifying his daily curfew on Monday, June 21, 2021 to end at 5:30 a.m., and begin at 11:30 p.m. Mr. Martinez's flight itinerary has been provided to the United States, Pretrial Services, and the U.S. Probation Office.

On June 16, 2021, Mr. Martinez sought the United States' position on the relief requested herein. Assistant United States Attorney Kaitlin Farrell represented that the United States does not object to the relief requested herein.

Mr. Martinez has complied with all of his release conditions and cooperated fully with the Pretrial Services and Probation Offices supervising his release. On June 16, 2021, undersigned counsel sought the United States Pretrial Services Office and the United States Probation Office's positions on the relief requested herein. United States Pretrial Services Officer Ramel Moore

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represented that his office does not object to the relief requested herein. United States Probation Officer Juan Nunez previously represented to counsel that his office would follow the guidance of the United States Pretrial Services Office on matters relating to modification of Mr. Martinez's release conditions.

Wherefore, for the reasons cited herein, it is respectfully requested that the Court grant this application and issue an Order modifying Mr. Martinez's curfew on Monday, June 21, 2021 to end at 5:30 a.m. and begin at 11:30 p.m.

Respectfully submitted,



Julia M. Coleman  
Steven J. McCool  
Michael Cornacchia  
Ramon Abadin

*Counsel for Carlos Martinez*

cc: Counsel of record  
U.S. Pretrial Services Officer Ramel Moore (by e-mail)  
U.S. Probation Officer Juan Nunez (by e-mail)